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The paper and wood products manufacturing industry has met many costly regulatory challenges over the years, spending billions of dollars as part of its environmental stewardship. Those investments have led to major improvements in air quality, including a 29 percent reduction in emissions of nitrogen oxide and 53 percent for sulfur dioxide by our pulp and paper facilities since 2000. Unfortunately, the industry faces challenges from new and existing regulations – driven by lawsuits under the Clean Air Act – that together could impose more than \$10 billion in new capital obligations on the industry over the next 10 years. The cumulative burden being imposed on our business is unsustainable.

AF&PA members are working with EPA, the administration, Congress, states and other stakeholders to achieve a sustainable regulatory path for the future.

Policy Recommendations:

- EPA should quickly revise select Boiler MACT emission limits as required by the court using its existing database so they are achievable and affordable.
- Given the significant tightening of National Ambient Air Quality Standards (NAAQS) in the last decade, EPA should defer further tightening, absent compelling new health effects evidence, to allow existing emission reduction programs to take full effect and allow states and industry the time to implement and meet current standards.
- Tighter NAAQS threaten to create permitting gridlock and halt needed facility expansions unless EPA adopts more flexible policies and allows use of more realistic emissions data and modeling tools.
- EPA should defer implementation of the 2015 Ozone NAAQS for at least five years and so states can take into account emission improvements that will occur anyway from current programs and make adjustments for contributions from background sources.
- EPA's revised framework to account for biogenic carbon is a step in the right direction for recognizing the carbon benefits of certain manufacturing residuals, but the forest products industry needs certainty on how biogenic carbon is treated in federal regulations like the Clean Power Plan, as well as air permitting programs.
- As EPA assesses the need for further regulation of pulp mills, it should acknowledge the significant air quality improvements already achieved with over a billion dollars in control investments that mitigated any health risks and still are the best technologies.
- The agency should allow states to submit implementation plans for startup, shutdowns and malfunctions (SSM) that rely on flexible work practices and site-specific approaches incorporated in a mill's Title V permit. EPA should not define unavoidable SSM events as violations of the Clean Air Act but rather set policies that encourage protection of workers and equipment.